

1 **SAO**

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10 *Attorneys for Defendants,*
11 County of Clark and Victor Zavala

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 BRIAN BORENSTEIN, an individual,

15 Plaintiff,

16 vs.

17 THE ANIMAL FOUNDATION, a domestic
18 nonprofit corporation; COUNTY OF CLARK,
19 a political subdivision of the State of Nevada;
20 SUNRISE HOSPITAL AND MEDICAL
21 CENTER, LLC, a foreign limited-liability
22 company domiciled in Delaware; CARLY
23 SCHOLTEN, an individual; VICTOR
24 ZAVALA, an individual; and ROE BUSINESS
25 ENTITIES 1-5; and DOE INDIVIDUALS 1-5,

26 Defendants,

27 CASE No.: 2:19-CV-00985-APG-DJA

28 **STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS COUNTY OF
CLARK AND VICTOR ZAVALA TO
RESPOND TO [206] PLAINTIFF'S
OPPOSITION TO MOTION TO DISMISS
SECOND AMENDED COMPLAINT**

(FIRST REQUEST)

19 Defendants, COUNTY OF CLARK and VICTOR ZAVALA (collectively, the "County
20 Defendants"), by and through their counsel, Jonathan D. Blum, Esq., of the law firm Wiley Petersen,
21 and Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene K. Palmer, Esq. of The
22 Palmer Law Firm, P.C., and Robert S. Melcic, Esq., hereby stipulate and request the Court to extend
23 the deadline for the County Defendants to respond to [ECF 206] Plaintiff's Opposition to Motion To
24 Dismiss Second Amended Complaint by two days from Friday, October 8, 2021 to Tuesday, October
25 12, 2021.

26 Counsel for the County Defendants have requested this short extension due to various work
27 obligations and the fact that it will be difficult to substantively respond to the 25-page Opposition in
28

1 five business days. This stipulated extension is for good cause, and not for improper delay.

2

3 DATED this 6 day of October 2021.

4 **THE PALMER LAW FIRM, P.C.**

5 By: Raelene K. Palmer
6 Raelene K. Palmer, Esq.
7 Nevada Bar No. 8602
8 5550 Painted Mirage Road, Suite 320
9 Las Vegas, Nevada 89149

10 Robert S. Melcic, Esq.
11 Nevada Bar No. 14923
12 4930 Mar Vista Way
13 Las Vegas, Nevada 89121

14 *Attorneys for Plaintiff,*
15 *Brian Borenstein*

16 DATED this 6 day of October 2021.

17 **WILEY PETERSEN**

18 By: Jonathan D. Blum
19 Jonathan D. Blum, Esq.
20 Nevada Bar No. 9515
21 1050 Indigo Drive, Suite 200B
22 Las Vegas, Nevada 89145

23 *Attorneys for Defendants,*
24 *County of Clark and Victor Zavala*

25 **ORDER**

26 IT IS SO ORDERED.

27 DATED: October 8, 2021

28 
ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE